

25 Feb 2024

Chief Commissioner BBMP Bengaluru Email: <u>commr@bbmp.gov</u>

Dear Sir:

Subject: Request for Heritage buildings and spaces to be exempt from BBMP Property tax

The new property tax system draft based on guidance value, has potentially very detrimental impact on heritage buildings. This aspect may have been inadvertently missed out in this draft as we are aware that BBMP has placed a strong focus on preserving heritage as outlined in the <u>UDD Model Building Bylaws 2017</u>. High Court had also reiterated set up of a <u>Heritage Conservation Committee</u> in Jun 23. We therefore urge BBMP to not only to exempt all buildings from this new system, but to completely exempt them from property tax at all, and to incentivize owners and tenants to preserve the building such as it is. We also recommend that incentives and given for maintenance and restoration for such buildings and a matching grant or a separate fund be created to ensure that these buildings remain as part of a glorious city history and heritage. As part of our smart city focus, this needs to be done and protected. Else this move will be viewed as an attempt to openly encourage demolition & development of such heritage properties, by penalizing already struggling owners.

On the positive side, this is actually a good time for the BBMP to demonstrate their genuine commitment to heritage and its preservation to preserve <u>core city</u> history. Our thoughts as are under:

- BBMP must use this & other tools (heritage fund, PPP, TDR etc) to incentivize heritage property to owners to retain & preserve Bangalore's collective history, There are NONE at present, and a myopic, narrow view could further heritage erosion. That is not what a visionary city corporation wants, we presume.
- The capital value of such old homes will be huge given land & location. There is no additional revenue inflow
 while the capital value appreciates. Unrealistic Tax on such properties will be a <u>huge disincentive to
 conserve</u>. Therefore, the guidance value proposed is meaningless, even counterproductive. <u>Delhi</u> had
 proposed <u>tax sops</u> incl <u>full waiver</u> and <u>West Bengal</u>, <u>Kolkata</u> as well.
- High property tax may appear to many that the intent is to make properties available for development, as that is where the potential for the present government to make gains. In the last RMP too, there was a dramatic increase in heritage buildings being sold for development. This must be prevented.
- The reality is that most old properties have multiple, and often, adversarial owners. The others (except a few well invested ones) are sadly waiting for the right excuse to sell and this could be the final straw. It's hard to own these properties security, maintenance and most of all costs are very difficult. There is no reason to keep them for most and this property tax revision could serve as just another excuse to give up.
- The government also should:
 - Allow for higher depreciation for older buildings.
 - Have tax incentives or matching grants for any building maintenance or restoration.
 - Heritage Fund and ward wise budget allocation
 - Discount for open spaces within private properties like gardens. For eg within the revenue ambit, there is a provision for nil revenue payable for uncultivable lands. It should be similar for heritage.

Look forward to your taking these simple steps in the property tax issue to prioritize city heritage conservation.

Thanking You, Yours Sincerely,

Team Heritage Beku